

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

ROCKWELL AUTOMATION  
TECHNOLOGIES, INC.,

*Plaintiff,*

v.

SECURE CROSSING RESEARCH  
AND DEVELOPMENT INC.,

*Defendant.*

Case No. 2:12-cv-10274-GCS-MKM

Honorable George Caram Steeh

**EMERGENCY ADMINISTRATIVE MOTION FOR LEAVE TO FILE DOCUMENTS  
UNDER SEAL**

Plaintiff Rockwell Automation Technologies, Inc. (“Rockwell”), by and through its counsel, hereby moves for an order granting it permission to file portions of its opposition to Defendant Secure Crossing Research & Development Inc.’s (“Secure Crossing”) motion to stay all proceedings (Docket 31) under seal.

This administrative motion is filed following a conference of counsel pursuant to Local Rule 7.1(a) which took place in the afternoon of June 18, 2012 by telephone and continued by email. At the time of this filing, Mr. Weintraub, Counsel for Secure Crossing, has not provided consent for the relief sought by this administrative motion.

Dated: June 18, 2012

Respectfully submitted,

/s/ Paul Tanck

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**ATTORNEYS FOR PLAINTIFF ROCKWELL  
AUTOMATION TECHNOLOGIES, INC.**

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**MEMORANDUM IN SUPPORT OF EMERGENCY ADMINISTRATIVE MOTION FOR  
LEAVE TO FILE DOCUMENTS UNDER SEAL**

Plaintiff Rockwell Automation Technologies, Inc. (“Rockwell”) intends to file its opposition brief to Defendant Secure Crossing Research & Development Inc.’s (“Secure Crossing”) motion to stay all proceedings (Docket 31) on June 20, 2012. In support of this brief, Rockwell intends to rely on materials that have been provisionally designated as “ATTORNEYS EYES ONLY” by Secure Crossing pursuant to the protective order entered by the Court on May 31, 2012 (the “Protective Order”). (See Docket 30). The Protective Order does not automatically grant the parties the right to file under seal documents that contain protected materials.

Specifically, Rockwell intends to rely on the deposition of Randall Reeves which has been provisionally designated as ATTORNEYS EYES ONLY by Secure Crossing. Rockwell is entitled to rely on this deposition to support its opposition to Secure Crossing’s Motion to Stay. As Rockwell is obligated to protect from disclosures materials designated as ATTORNEYS EYES ONLY under the Protective Order, Rockwell seeks permission from the Court to file a redacted opposition brief and an un-redacted version under seal.

Dated: June 18, 2012

Respectfully submitted,

/s/ Paul Tanck

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**ATTORNEYS FOR PLAINTIFF ROCKWELL  
AUTOMATION TECHNOLOGIES, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18th day of June, 2012 a copy of the foregoing was electronically filed with the Clerk of the Court using the ECF system which will send notification of such filing to the attorneys of record.

Dated: June 18, 2012

/s/ Lisa Schapira

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